

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IMRAN KHAN, et al.,

*Plaintiffs,*

v.

BOARD OF DIRECTORS OF PENTEGRA  
DEFINED CONTRIBUTION PLAN, et al.,

*Defendants.*

Case No. 7:20-cv-07561

**JOINT MOTION TO SEAL**

In accordance with the Court's Individual Practice 5(B), Plaintiffs and Defendants in the above-captioned matter (jointly the "Parties") seek leave to file Plaintiffs' Exhibits 1–6, and Defendants' Exhibits A–G attached to the Parties' Joint Pre-Motion Letter under seal.

In support of this Motion, the Parties state that the Joint Pre-Motion Letter quotes documents that have been designated as Confidential pursuant to the terms of the Protective Order (Doc. 121) because they disclose sensitive business and corporate financial information. Because these quotations form the basis of the discovery dispute outlined in the Joint Pre-Motion Letter, the Parties submit the documents from which they were drawn to provide the Court the context in which these quotations were made.

For these reasons, the Parties respectfully request that the Court grant the Parties' Motion to Seal Plaintiffs' Exhibits 1–6 and Defendants' Exhibits A–G to the Parties' Joint Pre-Motion Letter.

Granted.

SO ORDERED.



Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
November 12, 2021

Dated: November 11, 2021

/s/ Troy A. Doles

SCHLICHTER BOGARD & DENTON LLP

Andrew D. Schlichter, Bar No. 4403267

Jerome J. Schlichter\*

Troy A. Doles\*

Kurt C. Struckhoff\*

Alexander L. Braitberg\*

100 South Fourth Street, Suite 1200

St. Louis, Missouri 63102

Telephone: (314) 621-6115

Facsimile: (314) 621-5934

aschlichter@uselaws.com

jschlichter@uselaws.com

tdoles@uselaws.com

kstruckhoff@uselaws.com

abraitberg@uselaws.com

\*admitted *pro hac vice*

*Interim Class Counsel for All Plaintiffs*

/s/ Mark C. Nielsen

GROOM LAW GROUP, CHARTERED

Mark C. Nielsen, Bar No. MN4214

Sarah M. Adams (*pro hac vice*)

Edward J. Meehan (*pro hac vice*)

David N. Levine (*pro hac vice*)

Kevin L. Walsh (*pro hac vice*)

Ross P. McSweeney (*pro hac vice*)

Kalena R. Kettering (*pro hac vice*)

1701 Pennsylvania Ave., N.W.

Washington, D.C. 20006

202-857-0620 (phone)

202-659-4503 (fax)

mnielsen@groom.com

sadams@groom.com

emeehan@groom.com

dlevine@groom.com

kwalsh@groom.com

rmcsweeney@groom.com

lkettering@groom.com

*Attorneys for Defendants*